SERFF Tracking #: FGLI-132261964   *State Tracking #:*   *Company Tracking #:* MVA SOV UPDATE

State:	*District of Columbia*	*Filing Company:*	*Fidelity & Guaranty Life Insurance Company*
TOI/Sub-TOI:	*A10 Annuities - Other/A10.000 Annuities - Other*		
Product Name:	*MVA SOV Update*		
Project Name/Number:	*MVA SOV Update/*		

Filing at a Glance

Company:	Fidelity & Guaranty Life Insurance Company
Product Name:	MVA SOV Update
State:	District of Columbia
TOI:	A10 Annuities - Other
Sub-TOI:	A10.000 Annuities - Other
Filing Type:	Form
Date Submitted:	02/13/2020
SERFF Tr Num:	FGLI-132261964
SERFF Status:	Submitted to State
State Tr Num:	
State Status:	
Co Tr Num:	MVA SOV UPDATE
Implementation Date Requested:	On Approval
Author(s):	Naomi Quick, Hollie Henderson
Reviewer(s):	
Disposition Date:	
Disposition Status:	
Implementation Date:	

SERFF Tracking #:	FGLI-132261964	*State Tracking #:*		*Company Tracking #:*	MVA SOV UPDATE

State:	District of Columbia		*Filing Company:*	Fidelity & Guaranty Life Insurance Company
TOI/Sub-TOI:	A10 Annuities - Other/A10.000 Annuities - Other			
Product Name:	MVA SOV Update			
Project Name/Number:	MVA SOV Update/			

General Information

Project Name: MVA SOV Update

Project Number:

Requested Filing Mode: Informational

Explanation for Combination/Other:

Submission Type: New Submission

Overall Rate Impact:

Deemer Date:

Submitted By: Hollie Henderson

Status of Filing in Domicile: Pending

Date Approved in Domicile:

Domicile Status Comments:

Market Type: Individual

Individual Market Type:

Filing Status Changed: 02/13/2020

State Status Changed:

Created By: Hollie Henderson

Corresponding Filing Tracking Number:

Filing Description:
NAIC: 63274
FIN: 52-6033321

We are submitting this informational filing in order to revise the Statement of Variability previously submitted with rider form ARI-1075(9-15), Market Value Adjustment Rider. This rider was previously approved by the Department under SERFF Filing No. FGLI-130445348

The revised SOV is to add additional index names. For your assistance in reviewing, attached to the Supporting Documentation tab is a redline version of the previously approved Statement of Variability.

The index used on the rider will be based on the marketing product design.

If you have any questions regarding this submission, please feel free to contact me.

Thank you for your time and consideration of this filing.

Company and Contact

Filing Contact Information

Hollie Henderson, Sr. Compliance Analyst   hollie.henderson@fglife.com

601 Locust Street   443-676-3778 [Phone]

Des Moines, IA 50309

Filing Company Information

Fidelity & Guaranty Life Insurance Company

601 Locust Street

Des Moines, IA 50309

(515) 259-8268 ext. [Phone]

CoCode: 63274

Group Code:

Group Name:

FEIN Number: 52-6033321

State of Domicile: Iowa

Company Type:

State ID Number:

Filing Fees

Fee Required?   No

Retaliatory?   No

Fee Explanation:

Supporting Document Schedules

Satisfied - Item:	Statement of Variability
Comments:	
Attachment(s):	SOV ARI-1075(9-15)_MVA Rider_Revised.pdf SOV ARI-1075(9-15)_MVA Rider_Revised_Redline.pdf
Item Status:	
Status Date:	

STATEMENT OF VARIABILITY

New Form Name	Form Number
Market Value Adjustment Rider	ARI-1075(09-15)

The following information describes the nature and scope of the variable material. Any use of variability will be administered in a uniform and non-discriminatory manner and will not result in unfair discrimination. The final form issued to the consumer will not contain brackets denoting variable text. We certify any change or modification to a variable item shall be administered in accordance with the requirements in the Variability of Information section, including any requirements for prior approval of a change or modification.

Market Value Adjustment Factor – Offset Factor	On new issues, the offset factor in the Market Value Adjustment formula (currently shown as 0.0025) may vary depending on the economic, competitive, and regulatory environment. This factor may vary between 0-0.0025 (inclusive). Once issued, the offset factor is fixed for the life of the Rider.
Index	On new issues, the index used to calculate the Market Value Adjustment factor may vary. The index is set at contract issue. Possible indices include: Bloomberg Barclays US Aggregate Index yield Bloomberg Barclays US Aggregate Index yield to worst Bloomberg US Corporate Bond Index yield Bloomberg US Corporate Bond Index yield to worst US Treasury Constant Maturity Series
Market Value Adjustment Factor – Variable Language	Applicability of the phrase "with time to maturity equal to the Market Value Adjustment Period" depends on the index used in the Market Value Adjustment Factor calculation. This language will print if the Market Value Adjustment Factor calculation is based on the US Treasury Constant Maturity Series. This language will not print if the Market Value Adjustment Factor calculation is based on either the Barclays US Aggregate Index yield or the Bloomberg US Corporate Bond Index yield.
	The sentence "Straight line interpolation is used to determine the rate for a period to maturity not published." depends on the index used in the Market Value Adjustment Factor calculation. This language will print if the Market Value Adjustment Factor calculation is based on the US Treasury Constant Maturity Series. This language will not print if the Market Value Adjustment Factor calculation is based on either the Barclays US Aggregate Index yield or the Bloomberg US Corporate Bond Index yield.
Account Value – Variable Language	The bracketed word "vested" will print depending on the base contract to which this rider is attached. All instances will either read "vested account value" or "account value", depending on the product, its features, and contract terminology.
Index Disclosure	Provision will print if index used is based on Barclays US Aggregate Index Provision will not print if index used is based on Bloomberg US Corporate Bond Index or US Treasury Constant Maturity Series. Index Disclosure language may vary should this language change at the request of the Index.
President's Name and Title	To allow for flexibility should the company officer change.

STATEMENT OF VARIABILITY

New Form Name	Form Number
Market Value Adjustment Rider	ARI-1075(09-15)

The following information describes the nature and scope of the variable material. Any use of variability will be administered in a uniform and non-discriminatory manner and will not result in unfair discrimination. The final form issued to the consumer will not contain brackets denoting variable text. We certify any change or modification to a variable item shall be administered in accordance with the requirements in the Variability of Information section, including any requirements for prior approval of a change or modification.

Market Value Adjustment Factor – Offset Factor	On new issues, the offset factor in the Market Value Adjustment formula (currently shown as 0.0025) may vary depending on the economic, competitive, and regulatory environment. This factor may vary between 0-0.0025 (inclusive). Once issued, the offset factor is fixed for the life of the Rider.
Index	On new issues, the index used to calculate the Market Value Adjustment factor may vary. The index is set at contract issue. Possible indices include: Bloomberg Barclays US Aggregate Index yield Bloomberg Barclays US Aggregate Index yield to worst Bloomberg US Corporate Bond Index yield Bloomberg US Corporate Bond Index yield to worst US Treasury Constant Maturity Series
Market Value Adjustment Factor – Variable Language	Applicability of the phrase "with time to maturity equal to the Market Value Adjustment Period" depends on the index used in the Market Value Adjustment Factor calculation. This language will print if the Market Value Adjustment Factor calculation is based on the US Treasury Constant Maturity Series. This language will not print if the Market Value Adjustment Factor calculation is based on either the Barclays US Aggregate Index yield or the Bloomberg US Corporate Bond Index yield.
	The sentence "Straight line interpolation is used to determine the rate for a period to maturity not published." depends on the index used in the Market Value Adjustment Factor calculation. This language will print if the Market Value Adjustment Factor calculation is based on the US Treasury Constant Maturity Series. This language will not print if the Market Value Adjustment Factor calculation is based on either the Barclays US Aggregate Index yield or the Bloomberg US Corporate Bond Index yield.
Account Value – Variable Language	The bracketed word "vested" will print depending on the base contract to which this rider is attached. All instances will either read "vested account value" or "account value", depending on the product, its features, and contract terminology.
Index Disclosure	Provision will print if index used is based on Barclays US Aggregate Index Provision will not print if index used is based on Bloomberg US Corporate Bond Index or US Treasury Constant Maturity Series. Index Disclosure language may vary should this language change at the request of the Index.
President's Name and Title	To allow for flexibility should the company officer change.